

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENVILLE**

UNITED STATES OF AMERICA

v.

No. 2:09-CR-045

RONNIE COOPER

**AFFIDAVIT OF CLANCY NOLAN
IN SUPPORT OF RONNIE COOPER'S
MOTION TO VACATE, SET ASIDE, OR CORRECT SENTENCE
PURSUANT TO 28 U.S.C. § 2255**

STATE OF NEW YORK)
) ss.
COUNTY OF ULSTER)

I, Clancy Nolan, declare under penalty of perjury that the following facts are true and correct to the best of my personal knowledge.

1. I am a senior investigator with the Mintz Group, a research and investigative firm based in New York, New York.

2. I have been retained by Paul, Weiss, Rifkind, Wharton & Garrison, LLP ("Paul, Weiss"), in connection with its representation of Ronnie Cooper.

3. In the course of the investigation, the Mintz Group retained private investigators Lois Colley and Mark Garner for assistance in locating individuals possibly in possession of relevant information.

4. Together, Ms. Colley and I interviewed Jamie Lavon Rush in Columbia, South Carolina on October 26, 2015. The interview lasted approximately two hours.

During this interview, Mr. Rush was straightforward and spoke openly concerning the events surrounding Mr. Cooper's trial and conviction.

5. During the interview, Mr. Rush told us unequivocally that Mr. Cooper did not have any involvement whatsoever with Sunnah Maddox's drug operation. He described Mr. Cooper as a stand-up guy who got roped into the investigation based on some bad circumstances.

6. Mr. Rush said that federal agents told him at some point that Sunnah Maddox had threatened him and that the agents played a recording of a phone conversation between Mr. Maddox and Mr. Cooper where Mr. Maddox said, among other things, "green light" on Mr. Rush. Mr. Rush said he never took this call seriously or worried for his safety. Mr. Rush said that if there were any real threat on his life, he would have been placed in protective custody.

7. Mr. Rush also told us that that he met with law enforcement officials on a number of occasions prior to testifying at trial and that, when was asked questions about Mr. Cooper's involvement with Sunnah Maddox's drug operation, Mr. Rush informed the law enforcement officials that Mr. Cooper was not at all involved. Mr. Rush could not recall which specific individual or individuals he provided with this information.

8. Mr. Rush expressed what appeared to me to be a genuine interest in assisting with Mr. Cooper's case. He told us that he would consider signing an affidavit regarding the statements he made to law enforcement officials concerning Mr. Cooper but that he would need some time to think about it. He said that he would speak with his probation officer and consider whether he wanted to get directly involved.

9. On October 30, 2015, I received a phone call from Jennifer Douglass, who identified herself as Mr. Rush's probation officer. Ms. Douglass stated that Mr. Rush had approached her about signing an affidavit in connection with this matter. She said that she had certain concerns with his participation. I told her that I would relay her concerns to Andrew Markquart, an associate at Paul, Weiss.

* * *

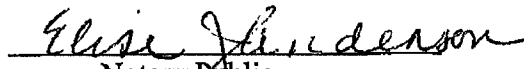
I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing paper are true.

Dated: Kingston, New York
November 24, 2015



Clancy Nolan

Sworn to before me this
24th day of November, 2015


Notary Public

ELISE J. ANDERSON
Notary Public - State of New York
No 01AN6107850
Qualified in Ulster County
My Commission Expires April 12, 2015



CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

/s/ Jaren Janghorbani
Jaren Janghorbani
Paul, Weiss, Rifkind, Wharton & Garrison LLP